

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Care One Management, LLC, et al.,

Plaintiffs,

-v-

United Healthcare Workers East, SEIU  
1199, et al.,

Defendants.

Civil Action No. 2:12-cv-06371-  
SDW-MAH

**DECLARATION OF JACOB  
KARABELL IN SUPPORT OF  
DEFENDANTS' TRIAL BRIEF**

I, Jacob Karabell, hereby declare as follows:

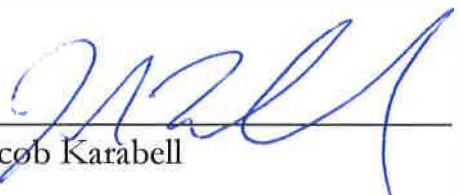
1. I am an attorney with the law firm of Bredhoff & Kaiser, PLLC, counsel for Defendants 1199SEIU United Healthcare Workers East; New England Health Care Employees Union, District 1199; and Service Employees International Union. I make this declaration based on my personal knowledge and in support of Defendants' Trial Brief.
2. Attached hereto as Exhibits 1–6 are true and correct copies of the following items from the record in the above-referenced matter, including a description of the exhibits that are cited in Defendants' Trial Brief:

<b>Exhibit Number</b>	<b>Document Description</b>	<b>Source/Cite in Defendants' Brief</b>
1	Witness Affidavit of Suzanne Clark, dated July 3, 2012	DX245
2	Condon email to Ortelle and Cass, dated June 26, 2012, and excerpts of attachments.	Excerpts of DX34
3	Excerpts of Linda Martin Deposition Transcript, dated February 28, 2018	L. Martin Tr.

Exhibit Number	Document Description	Source/Cite in Defendants' Brief
4	Compliance Update presentation, dated June 2013	DX72
5	Marcos email to Petricone, Cumsky, and Petricone, dated November 17, 2012	DX27
6	Excerpts of Fran Petricone Deposition Transcript, dated October 17, 2018	Petricone Tr.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Dated: May 2, 2025

  
\_\_\_\_\_  
Jacob Karabell